



Sacco & Fillas, LLP
Attorneys at Law

May 5, 2025

31-19 Newtown Avenue
Seventh Floor
Astoria, NY 11102

Tel: 718 746-3440
Direct: 718 269-1668
Direct Fax: 718 425-9625

Zalasalvar@saccofillas.com
www.saccofillas.com

Tonino Sacco*
Elias N. Fillas

Luigi Brandimarte*
Lamont K. Rodgers
Joseph Katz

Malik E. Anderson*
Scott L. Appelbaum
Joseph Badalov
James R. Baez*
Joseph Benincasa
Jack Berry
Victor I. Bota*
Nathan A. Brill*
Joanne Ciaramella
David A. Craven
Alex Diaz
Christopher DelCioppio*
Kurt A. Doiron
Jennifer A. Fleming
Ronald Groman
Madeline Howard
Zachary S. Kaplan
James Y. Kim*
Eric Y. Kim*
Patricia R. Lynch
John P. Margand
Albert R. Matuza, Jr.
Diamanda Papagiannakis
Andrew Rafalaf
Leopold Raic
Phillip R. Reid*
Bryan Schenkman
Richard E. Schirmer
Morris J. Schlaf*
Lantao Sun
Clifford R. Tucker*
William W. Wallis*
Michael S. Warycha
Zachary J. Zain
Alex Zhang
Anthony J. Zullo

*Also admitted in New Jersey

Via Email to: ioffealla@gmail.com

Via Email to: lexusjakel@gmail.com

Exclusive Properties Realty, Inc.
c/o Juda Niayzov
c/o Alevtina Ioffe
16 Duffield Drive
Ocean, New Jersey 07712

Re: Fair Housing Justice Center, Inc. v. Juda Niayzov, et al.
New York Eastern District Court; Docket No. 24-cv-4201
Our File No. 32941-24

Dear Mr. Niayzov and Ms. Ioffe,

Enclosed please find the invoice statement. Kindly, please review the invoice statement and make a payment of **\$12,231.90** for the expenses rendered on your account at your earliest convenience.

Please make check payable to "Sacco & Fillas, LLP" and send the payment to the following address:

Sacco & Fillas, LLP
Att: Zafer Alasalvar / Luigi Brandimarte
31-19 Newtown Avenue
Third Floor
Astoria, NY 11102

If you wish to make Zelle Payment please add Sacco & Fillas, LLP phone number 929-204-1028. If you have any questions or concerns, please don't hesitate to reach out to me anytime.

SACCO & FILLAS, LLP

/s/ Zafer Alasalvar

Zafer Alasalvar, Paralegal
31-19 Newtown Avenue, 3rd Fl.
Astoria, New York 11102
Email: Zalasalvar@saccofillas.com
Direct: 718-269-1668

Main Office:

31-19 Newtown Avenue
Seventh Floor
Astoria, New York 11102

Bayside Office:

42-40 Bell Boulevard
Suite 300
Bayside, NY 11361

Manhattan Office:

32 Broadway
Suite 1818
New York, NY 10004

New Jersey Office:

2160 North Central Road
Suite 100-3
Fort Lee, NJ 07024

SACCO & FILLAS, LLP

31-19 Newtown Avenue, 7th Fl.
Astoria, New York 11102

(718) 746-3440 • Fax (718) 732-2409 • E-mail lbrandimarte@saccofillas.com

STATEMENT

PRIVILEGED & CONFIDENTIAL

Juda Niayzov
Alevtina Ioffe
16 Duffield Drive
Ocean, NJ 07712

Account No. Niayzo.32941
RE: Fair Housing Justice Center, Inc.; S&F File No. 32941-2

Statement Date: 05/05/2025
Statement No. 11021
Page No. 1

Payments received after 05/05/2025 are not included on this statement.

Previous Balance \$10,204.14

Fees

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| 04/24/2025 | CPD | Attend conference in EDNY (including travel time) | 450.00 | 4.00 | 1,800.00 |
| | CPD | Phone call with clients in preparation for conference | 450.00 | 0.50 | 225.00 |
| 04/25/2025 | CPD | Discuss 4/24 court appearance with LB | | 0.20 | n/c |
| | CPD | Update file re: court appearance | | 0.50 | n/c |
| 04/30/2025 | CPD | Update file with emails containing discovery responses | | 0.10 | n/c |
| | CP2 | Scanned/Upload Plaintiffs Responses and Objections to the Demand for Documents and Interrogatories Dated March 19, 2025 Served by Defendants Zhang and Remax; Plaintiff's Responses and Objections to Defendants Niayzov, Ioffe, and Exclusive Properties Realty, Inc. Combined Discovery Demands; Plaintiffs Responses and Objections to Defendants Zheng and Weng's Combined Documents Requests; and Plaintiffs Responses and Objections to the Undated Document Requests and Interrogatories that Counsel for Defendant 202 Marine LLC Emailed to Plaintiff's Counsel on March 12, 2025 | | 0.30 | n/c |
| 05/05/2025 | CP2 | Received/Upload/Calendared Notice of Depositions for Yu Li Weng, Nicholas Sekas and Xian Jin Zhang | | 0.30 | n/c |
| | | For Current Services Rendered | | 4.50 | 2,025.00 |
| | | Total Non-billable Hours | | 1.80 | |

Expenses

| | | |
|------------|----------------|------|
| 04/24/2024 | Postage | 0.69 |
| 04/24/2024 | Postage | 0.69 |
| 04/24/2024 | Postage | 0.69 |
| 04/24/2024 | Postage | 0.69 |
| | Total Expenses | 2.76 |

To ensure proper credit, please include account number and statement date on remittance checks. Thank you.

Juda Niayzov
Account No. Niayzo.329
RE: Fair Housing Justice Center, Inc.; S

Statement Date: 05/05/2025
Statement No. 11021
Page No. 2

Total Current Work 2,027.76

Balance Due \$12,231.90

| Aged Due Amounts | | | | | |
|------------------|--------------|--------------|---------------|----------------|-------------|
| <u>0-30</u> | <u>31-60</u> | <u>61-90</u> | <u>91-120</u> | <u>121-180</u> | <u>181+</u> |
| 5,987.76 | 6,244.14 | 0.00 | 0.00 | 0.00 | 0.00 |

| Billing History | | | | |
|-----------------|-----------------|-----------------|-----------------------|-----------------|
| <u>Fees</u> | <u>Expenses</u> | <u>Advances</u> | <u>Finance Charge</u> | <u>Payments</u> |
| 27,225.00 | 6.90 | 0.00 | 0.00 | 15,000.00 |